

ADMITTED IN
CALIFORNIA AND IN THE
DISTRICT OF COLUMBIA

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January 9, 2017

JAN - 9 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

Re: Entercom License LLC
MB Docket 16-357

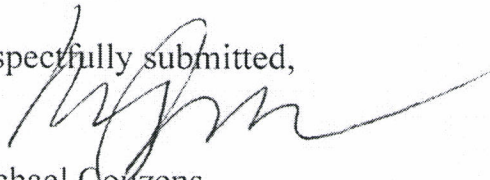
DOCKET FILE COPY ORIGINAL

Dear Ms. Secretary:

Submitted here are an original and five copies of "errata" concerning a Petition to Enlarge Issues. The underlying petition was submitted via overnight Federal Express to arrive today at your courier facility in Capitol Heights, Maryland. It has come to our attention that two pages were missing through, apparently, a copying error. The errata supplies the two pages. Please associate this filing with the underlying petition for all purposes.

This a docketed proceeding set for hearing before Chief Administrative Law Judge Richard L. Sippel, Hearing designation Order FCC 16-153 released on October 27, 2016. Any questions with respect to this matter should be directed to the undersigned.

Respectfully submitted,


Michael Couzens,
Attorney for
Media Action Center and Sue Wilson

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Accepted / Filed

JAN - 9 2017

Federal Communications Commission
Office of the Secretary

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
) MB Docket No. 16-357
Entercom License, LLC) Facility ID No. 65483
Applications for Renewal of License for Station) File Nos. BRH-20050728AUU
KDND(FM), Sacramento, California) and BRH-20130730ANM

**PETITION TO ENLARGE ISSUES
BY
MEDIA ACTION CENTER AND SUE WILSON**

E R R A T A

Through a copying or collating error, the attached pages were omitted from this
filing:

Motion, p. 15

Attachment C, p. 7

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January 9, 2017.

(k) To determine, in light of the evidence adduced under the foregoing issues and the totality of circumstances, whether Entercom License, LLC operated Stations KUDL (FM); KIFM (AM); KKDO (FM); KRXQ (FM) and KSEG (FM) in the public interest during the most recent license term;

(l) To determine, light of the evidence adduced under the foregoing issues and the totality of circumstances, whether Entercom's applications for renewal of licenses should be granted, as follows:

KUDL (FM)	File No. BRH-20130730ANC
KIFM (AM)	File No. BRH-20130730ANG
KKDO(FM)	File No. BRH-20130730AND
KRXQ (FM)	File No. BRH-20130730ANI
KSEG (FM)	File No. BRH-20130730ANK.

(m) To determine, light of the evidence adduced under the foregoing issues and the totality of circumstances, whether Entercom License LLC possesses the necessary character attributes of reliability and legal compliance to be a Commission licensee of Stations KDND (FM), KUDL (FM); KIFM (AM); KKDO (FM); KRXQ (FM) and KSEG (FM);

(n) To determine whether Entercom License LLC violated Section 73.3588 of the Rules, by failing to report to existence or terms of a settlement agreement, whereby judgment creditors in the case of *William A. Strange et al. v. Entercom*

ATTACHMENT C

1 Entercom Communications Corp. She did not have the authority to make policy for Entercom
2 Sacramento, LLC or for Entercom Communications Corp. Ms. Pechota Ray did not prepare the
3 Entercom General Guidelines (Depo. Ex. 30), but rather she was to follow the Guidelines.
4 Ms. Pechota Ray did not have authority to fire or hire employees. Ms. Pechota Ray's authority
5 was quite limited. Ms. Pechota Ray did not have the authority to set salaries. Ms. Pechota Ray
6 did not have responsibilities with respect to the sales, marketing (Fusion), program, business or
7 information technology departments, and the personnel from those departments did not report to
8 her. She had no authority to sign checks for Entercom Sacramento, LLC.

9
10 **G. STEVE WEED WAS NOT AN OFFICER, DIRECTOR, OR MANAGING AGENT**
11 **OF ENTERCOM SACRAMENTO, LLC OR ENTERCOM COMMUNICATIONS**
12 **CORP.**

13 19. At the time of the Contest, Steve Weed was the program director/station manager
14 for radio station KDND. Mr. Weed had no responsibility with respect to any of the other five
15 radio stations of Entercom Sacramento, LLC. Mr. Weed was not an officer or director of
16 Entercom Sacramento, LLC or Entercom Communications Corp. Mr. Weed was an employee of
17 Entercom Sacramento, LLC. He was not an employee of Entercom Communications Corp.

18 20. Steve Weed was not a managing agent of Entercom Sacramento, LLC or Entercom
19 Communications Corp. He did not have authority to make policy for Entercom Sacramento, LLC
20 or Entercom Communications Corp., but rather, he was to follow the corporate policies that were
21 relayed to him. Mr. Weed did not prepare the General Contest Guidelines; rather, he was to
22 follow the Guidelines in overseeing Ms. Pechota Ray in connection with contests and promotions
23 of KDND.

24 21. Even with respect to KDND, Mr. Weed's responsibilities were limited.
25 Mr. Weed's responsibilities as the station manager/program director of KDND were with respect
26 to overseeing the production and promotion aspects of KDND. Mr. Weed had no oversight over
27 numerous other departments of Entercom Sacramento, LLC, including the sales, marketing
28 (Fusion), business (financial) and information technology departments, and the personnel from
those departments did not report to Mr. Weed. Mr. Weed did not have authority to fire or hire

-7-

FOLGER LEVIN &
KAHN LLP
ATTORNEYS AT LAW

DECLARATION OF JOHN D. GEARY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION; CASE NO. 07AS00377